



Department of Energy

Richland Operations Office
P.O. Box 550
Richland, Washington 99352

MAY 2 1985

Mr. Marc Horton, Assistant Director
Washington Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504

Dear Mr. Horton:

COMPLIANCE ORDER DE-84-720

This letter responds to the March 29, 1985, letter from Mr. Roger Stanley to Mr. Ronald E. Gerton regarding the Department of Energy (DOE) February 1, 1985, submittals pursuant to Order DE-84-720. This letter also confirms subsequent submission dates discussed with Mr. Stanley by telephone on April 3, 1985.

Recognizing the comments that presentations by the several DOE contractors may be viewed as less than comprehensive, it is our plan to develop documentation that more fully details aspects of the site-wide dangerous waste management program in the form of the Part B Permit Application. The facility- and contractor-specific documents provided in the February 1 submittal were intended to meet or exceed the requirements of the Dangerous Waste Regulations and the informational requirements of the Order.

Notwithstanding our intention as mentioned above or the referenced comments, DOE does maintain the ultimate responsibility for management of Hanford Site activities. DOE does provide comprehensive direction to the contractor both through direct instruction on specific issues and through the DOE Order system. The DOE Orders provide the site-wide guidance to all contractors. It is the contractors responsibility to implement the guidance. As there are eight contractors at Hanford, there may be significant differences in the way implementation is documented. These differences, however, should not be viewed as a reduction in the level of compliance or commitment to achieving compliance with applicable regulations. However, we will improve the format of presentation to convey a more cohesive image.

A revised Part A Permit Application will be submitted to the Department of Ecology by June 1, 1985. The permit application will contain the 300 Area Process Trenches, as per WDOE comments regarding DOE proposed revisions to the permit. An expanded assessment of the 400 Area Process Pond has been transmitted under separate cover and addresses the status of the facility as a non-regulated unit. Subsequent revisions to the Part A Application will be prepared as indicated in the March 29 letter.

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U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.

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As noted in your letter of February 8, 1985, to me, information relating to radioactive mixed wastes need not be provided until the mixed waste issue is resolved. As a matter of comity, DOE provided in its February 1, 1985, submission to WDOE copies of a management plan for laboratory wastes and chemical sewers. We are revising this document to incorporate appropriate WDOE comments and will provide a copy of the revised plan to WDOE, as a matter of comity, upon completion.

Waste Analysis Plans, Personnel Training Plans, and the Groundwater Monitoring Plan are all being revised to incorporate WDOE comments, and can be submitted for your review by July 15, 1985, as well as in a site-wide format in the Part B Permit Application when that is provided.

The sodium and lithium stored at the 300 Area and 400 Area sites have not been designated as waste material. They are materials awaiting use. The hexone in the 200 S Area is radioactively contaminated and thus falls within the category of a mixed waste. Background information supporting these conclusions can be provided should that detail be necessary.

In preparation for development of the Part B Permit Application, an opportunity for DOE-RL and the contractor staff to meet with WDOE Industrial Section Representatives to discuss compliance related issues and the Part B Permit Application process would, in our opinion, be of much benefit. Such a discussion could be held on the Hanford Site during the week of May 13, 1985. Mr. M. W. Tiernan of my staff will contact Mr. Roger Stanley to confirm meeting arrangements, should such a discussion prove appropriate.

If you have any questions concerning the information discussed above, please contact me or Mr. M. W. Tiernan on (509) 376-7387.

Very truly yours,

Original Signed By
T.R. FITZSIMMONS

T. R. Fitzsimmons, Assistant Manager
for Safety, Safeguards and
Quality Assurance

SQA:PJK

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